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Leprino Foods Health & Welfare Plan

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

LEPRINO FOODS COMPANY;
LEPRINO FOODS HEALTH &
WELFARE PLAN,

Plaintiffs,

v.

AVANI OUTPATIENT SURGICAL
CENTER, INC., a California
Corporation; MOUNTAIN VIEW
SURGICAL CENTER, INC., a
California Corporation; THE
CENTER FOR SURGERY AT
BEDFORD, LLC, a California limited
liability company; AMY ZARAGOZA,
an individual; BABEK
MOEINOLMOLKI, an individual;
BENHAM KASHANCHI, an
individual; SAMUEL KASHANI, an
individual; SHERVIN AMINPOUR,
an individual; RALPH MAYER, an
individual; MICHAEL YADEGARI, an
individual; KARAPET
DERMENDJIAN, an individual;
SEPEHR LALEZARI, an individual;
MARIO ROSENBERG, an individual;
PEYMAN SOLIEMANZADEH, an
individual; and DOES 1-30,

Defendants.

Case No. 2:22-cv-07434 DSF (JC)

Assigned to Judge Dale S. Fischer.
Courtroom 7D

DECLARATION OF KATHERINE A.
BOWLES IN SUPPORT OF
REQUEST FOR ENTRY OF
DEFAULT

*Filed concurrently with Request for
Entry of default Against Defendant
Cristina Luz Perryman*

Action Filed: October 12, 2022
Trial Date: August 13, 2024

AND RELATED COUNTERCLAIMS.

1 I, Katherine A. Bowles, declare as follows:

2 1. I am an attorney duly admitted to practice before this Court. I am
3 a partner with Hanson Bridgett LLP, attorneys of record for Plaintiffs Leprino
4 Foods Company and Leprino Foods Health & Welfare Plan.

5 2. I have personal knowledge of the facts set forth in this
6 Declaration, and if called as a witness, I could and would competently testify
7 to the matters stated herein.

8 3. Plaintiffs Leprino Foods Company and Leprino Foods Health &
9 Welfare Plan (collectively, "Leprino") filed the Third Amended Complaint in
10 the above-titled action, *Leprino Foods Company, et al. v. Avani Outpatient*
11 *Surgical Center, Inc., et al.*, case number 2:22-cv-07434-DSF-JC, on
12 October 3, 2023 (Dkt. 251).

13 4. This Court issued a summons against Defendant Cristina Luz
14 Perryman ("Perryman") on October 3, 2023 (Dkt. 258).

15 5. On October 8, 2023, Perryman was personally served with both
16 the summons and the Third Amended Complaint.

17 6. On October 13, 2023, Plaintiffs filed with this Court a proof of
18 service of summons evidencing service of both the Third Amended
19 Complaint and summons on Perryman (Dkt. 271).

20 7. Perryman has failed to file a response to the Third Amended
21 Complaint and the time allowed for her to respond to the Third Amended
22 Complaint has expired.

23 8. Perryman is neither a minor or an incompetent person.


24 I declare under penalty of perjury under the laws of the United States
25 of America that the foregoing is true and correct.

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1 Executed on November 8, 2023, at Los Angeles, California.

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4 Katherine A. Bowles

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PROOF OF SERVICE

Leprino Foods Company, et al., v. Avani Outpatient Surgical Center, et al.

U.S.D.C. Central District of CA, Case No. 2:22-cv-07434 DSF (JC)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of . My business address is 777 S. Figueroa Street, Suite 4200, Los Angeles, CA 90017.

On November 9, 2023, I served true copies of the following document(s) described as **DECLARATION OF KATHERINE A. BOWLES IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

SEE ATTACHED SERVICE LIST.

BY HAND DELIVERY: I caused such envelope(s) to be delivered by hand to the office of the addressee(s).

**Cristina Luz Perryman
2256 Pleasant Court
Hanford, CA 93230**

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on November 9, 2023, at Los Angeles, California.

/s/ Silvia Abrignani
Silvia Abrignani

SERVICE LIST

Leprino Foods Company, et al., v. Avani Outpatient Surgical Center, et al.

U.S.D.C. Central District of CA, Case No. 2:22-cv-07434 DSF (JC)

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[Note: Updated April 2023]

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In Pro Per
PERSONAL SERVICE ONLY